

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

RYAN WINDSOR, CWISE \*  
HOLDINGS, LP, a Texas Limited  
Partnership, AND ALCATRAZ \*  
MEDIA, INC., a Delaware For-Profit  
Corporation, \*

Plaintiffs, \*

v. \* CASE NO. \_\_\_\_\_

CITY INFO EXPERTS, LLC, AND \*  
CHARLES THOMAS SCHMIDT, \*  
Individually, \*

Defendants. \*

[Removed from Superior Court of  
Fulton County, Georgia,  
Case No. 2021CV351475]

**DEFENDANT CITY INFO EXPERTS, LLC'S NOTICE OF REMOVAL**

COMES NOW Defendant City Info Experts, LLC ("City Info") and shows  
this Honorable Court as follows:

1. Plaintiffs Ryan Windsor ("Windsor"), CWISE Holdings, LP  
("CWISE") and Alcatraz Media, Inc. ("Alcatraz Media") filed a Complaint for  
Damages and Equitable Relief against City Info and Charles Thomas Schmidt in the  
Superior Court of Fulton County, State of Georgia, Civil Action No. 2021CV351475  
and styled *Ryan Windsor, CWISE Holdings, LP, a Texas Limited Partnership, and  
Alcatraz Media, Inc., a Delaware For-Profit Corporation v. City Info Experts, LLC,  
and Charles Thomas Schmidt, individually*. (Complaint, Exhibit "A", attached).

Defendant is attaching all documents contained in the Fulton County Court's file. (File, Exhibit "B", attached).

2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1332. The claims brought in the Complaint include claims arising under the laws of the United States, specifically the wire fraud and RICO statutes. Additionally, Defendant believes there is complete diversity of citizenship because Plaintiff Ryan Windsor is the sole owner of Cwiss Holdings, LP, and, on information and belief, is not a citizen of Texas. There is also more than \$75,000 in controversy in this case. Therefore, pursuant to 28 U.S.C. §§ 1441(a), 1446(b), and 1446(c), this matter may be removed to this Court.

3. This Notice is filed timely filed pursuant to 28 U.S.C. § 1446(c).

4. Defendant Charles Thomas Schmidt ("Schmidt") has consented to the removal of this action to the United States District Court for the Northern District of Georgia, Atlanta Division. (Consent, Exhibit "C", attached).

WHEREFORE, Defendant City Info Experts, LLC, prays that the entire action referred to herein above be removed to and proceed in the United States District Court for the Northern District of Georgia, Atlanta Division, that no further proceeds be held in the case originally filed in the Superior Court of Fulton County, State of Georgia.

This the 20<sup>th</sup> day of August, 2021.

Respectfully submitted,

/s/ Joe L. Leak

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/s/ M. Alan Holcomb

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*Attorneys for Defendants  
City Info Experts, LLC and  
Charles Thomas Schmidt*

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing pleading is typed in 14-Point, Times New Roman font and is otherwise formatted in compliance with LR 5.1.

This the 20<sup>th</sup> day of August, 2021.

/s/ Joe L. Leak

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2021, I electronically filed Petition for Removal using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney(s) of record:

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